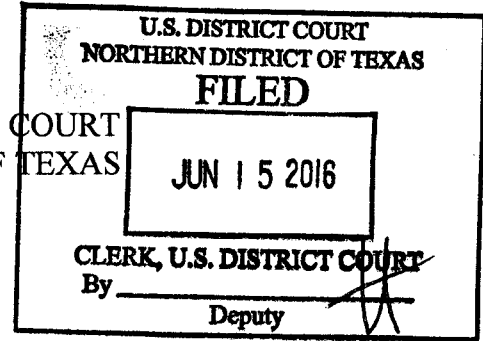


SEALED

ORIGINAL

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION



UNITED STATES OF AMERICA

NO.

v.

FILED UNDER SEAL

ANTHONY L. ROBINSON (1)

INDICTMENT **3-16CR-261-K**

The Grand Jury Charges:

COUNT ONE

Conspiracy to Bribe or Reward an Agent of
an Organization Receiving Federal Funds
(Violation of 18 U.S.C. § 371 (18 U.S.C. § 666(a)(1)(B)))

A. The Conspiracy and its Objects

From on or about September 13, 2012 through on or about May 24, 2013, in the Northern District of Texas and elsewhere, the defendant, **Anthony L. Robinson**, and unindicted co-conspirator W.S., knowingly and willfully conspired and agreed together and with each other to commit an offense against the United States, that is, to corruptly solicit, demand, accept and agree to accept a thing of value from a person, intending to be influenced and rewarded in connection with business, a transaction and a series of transactions of the Dallas County District Attorney's Office involving anything of value of \$5,000 or more in violation of 18 U.S.C. § 666(a)(1)(B) and as further described herein.

B. Manner and Means

1. At all times material to this Indictment, the Dallas County District Attorney's Office was an agency of the State of Texas that received federal benefits in excess of \$10,000 during the one-year period from September 1, 2012 to August 31, 2013.
2. The defendant, **Anthony L. Robinson**, was employed as the Chief Investigator at the Dallas County District Attorney's Office and, as such, was its agent.
3. Between on or about September 13, 2012 and May 24, 2013, in the Northern District of Texas and elsewhere, defendant **Anthony L. Robinson** did corruptly solicit, demand, accept and agree to accept a thing of value from a person, intending to be influenced and rewarded in connection with business, a transaction and a series of transactions of the Dallas County District Attorney's Office involving anything of value of \$5,000 or more, that is, defendant **Robinson** solicited, demanded, and accepted a bribe disguised as an investment of approximately \$200,000 in a cattle business from W.S., intending to be influenced and rewarded for the use of his position to assist in the dismissal of criminal charges that had been filed by the Dallas County District Attorney's Office against W.S.

C. Overt Acts

1. On or about September 13, 2012, **Robinson** traveled to Las Vegas at Dallas County expense to take custody of W.S. and return him to Dallas County to face a criminal charge. On the return trip, **Robinson** told W.S. that he wanted to enter the cattle

business. W.S. told **Robinson** that he was wealthy and would be willing to enter into business with **Robinson** if **Robinson** would assist in getting his criminal charges dismissed. **Robinson** agreed.

2. On or about February 28, 2013, **Robinson** drafted a proposed business partnership specifying that W.S. would supply the initial funding for the partnership, while **Robinson** would handle all day-to-day activities.

3. On March 26, 2013, W.S. deposited \$200,000 into a joint checking account. On March 27, 2013, **Robinson** signed paperwork adding himself as a co-owner of the joint checking account. The next day, **Robinson** wrote a check from the joint checking account to his wife in the amount of \$5,000. **Robinson** also made additional withdrawals from the account which he used for personal expenses.

4. On or about May 24, 2013, **Robinson** used his position as Chief Investigator at the Dallas County District Attorney's Office to persuade an Assistant District Attorney to dismiss the criminal charge pending against W.S.

All done in violation of 18 U.S.C. §371.

FORFEITURE NOTICE

Pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), upon conviction of the offense alleged in Count One of the Indictment, defendant **Anthony L. Robinson** shall forfeit to the United States any property, real or personal, which constitutes or is derived from proceeds traceable to that offense.

If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), as incorporated by 28 U.S.C. § 2461(c), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property described above.

A TRUE BILL


FOREPERSON

JOHN R. PARKER
UNITED STATES ATTORNEY


JAY WEIMER

Assistant United States Attorney
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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

THE UNITED STATES OF AMERICA

v.

ANTHONY L. ROBINSON (01)

INDICTMENT

18 U.S.C. § 371 (18 U.S.C. § 666(a)(1)(B))
Conspiracy to Bribe or Reward an Agent of
an Organization Receiving Federal Funds
1 Count

18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. 2461(c)
Forfeiture Notice

A true bill rendered

FORT WORTH

FOREPERSON

Filed in open court this 15th day of June, 2016.

Warrant to be Issued

UNITED STATES MAGISTRATE JUDGE
No Criminal Matter Pending